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6 Attorneys for Defendant  
7 VIRTUAL GUARD, INC.

8  
9 UNITED STATES DISTRICT COURT  
10  
11 DISTRICT OF NEVADA

12 DAWN YOSEF, an individual,  
13 Plaintiff,

14 v.  
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16 VIRTUAL GUARD, INC.;  
EMPLOYEE(S)/AGENT(S) DOES I-X; and  
ROE CORPORATIONS XI-XX, inclusive,

17 Defendant.  
18

Case No. 2:21-cv-02052-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME FOR THE PARTIES TO  
FILE DISMISSAL DOCUMENTS**

**[FIRST REQUEST]**

19 Plaintiff DAWN YOSEF (“Plaintiff”) and VIRTUAL GUARD, INC. (“Defendant”), by and  
20 through their respective counsel of record, hereby stipulate and agree to extend the time to file the  
21 dismissal documents currently set for March 18, 2022, (ECF No. 14).

22 The parties are currently in the final stages of finalizing settlement and issuing the settlement  
23 payment and require a brief extension of time beyond the original March 18, 2022 deadline to do so.  
24 In part, this extension is necessary to account for the proscribed revocation period.

25 The parties have been diligently working to finalize the settlement agreement and payment,  
26 and they are confident that it will be fully executed with the corresponding payment delivered shortly.  
27 Accordingly, the parties request a 30-day extension from the Court’s March 18, 2022 deadline (*see*  
28 ECF No. 14) to allow for the revocation period to pass, fully execute the agreement, issue the

1 settlement payment, and file the dismissal paperwork. The parties therefore respectfully request the  
2 deadline to file the dismissal paperwork be extended to **Monday, April 18, 2022**.

3 This request is made in good faith and not for the purpose of delay.

4  
5 Dated: March 11, 2022

6  
7 DATED: March 11, 2022

8 GABROY LAW OFFICES

9 LITTLER MENDELSON P.C.

10 /s/ Christian Gabroy  
11 Christian Gabroy, Esq. (#8805)  
Kaine Messer, Esq. (#14240)

12 Z. Kathryn Branson (#11540)  
13 Kelsey E. Stegall (#14279)

14 Attorneys for Plaintiff  
DAWN YOSEF

15 Attorneys for Defendant  
16 VIRTUAL GUARD, INC.

17  
18 **ORDER**

19 IT IS SO ORDERED.

20 Dated this 11th day of March, 2022.

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UNITED STATES MAGISTRATE JUDGE